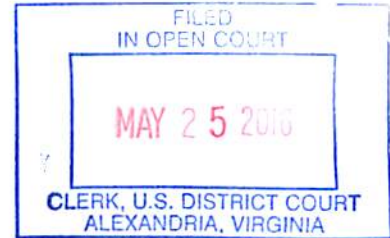


UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MARCEL LEHEL LAZAR

a/k/a "GUCCIFER"

a/k/a "GUCCIFER SEVEN"

a/k/a "MICUL FUM"

a/k/a "MARCEL LAZAR LEHEL"

Defendant.

Criminal No. 1:14-cr-213

Honorable James C. Cacheris

**MOTION TO DISMISS COUNTS**

The United States of America, by and through the undersigned attorneys, hereby moves this honorable Court to dismiss Counts 1-4, 6, and 8-9 against defendant MARCEL LEHEL LAZAR, in accordance with the written plea agreement entered into between the United States and defendant, upon the Court's acceptance of defendant's guilty plea to Counts 5 and 7 in the Indictment. A proposed order is attached to this motion.

Date: May 25, 2016

Respectfully submitted,

Dana J. Boente  
United States Attorney

By:

A handwritten signature in blue ink, appearing to read "Maya D. Song".

Maya D. Song  
Jay V. Prabhu  
Assistant United States Attorneys

Peter V. Roman  
Ryan K. Dickey  
Senior Counsel, U.S. Department of Justice  
Criminal Division  
Computer Crime and Intellectual Property Section